

Mar 11, 2020

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

Kathy A. Surratt - States
KATHY A. SURRETT-STATES
Chief United States Bankruptcy Judge

In re:) Case No.: 20-41308-659
FORESIGHT ENERGY, LP, et al.) Honorable Kathy A. Surratt-States
Debtors.) Chapter 11
) (Joint Administration Requested)
)

VERIFIED MOTION FOR ADMISSION PRO HAC VICE

Pursuant to LR 2090(B)(1) of the United States Bankruptcy Court for the Eastern District of Missouri, and Rule 12.01(F) of the local rules of the United States District Court for the Eastern District of Missouri, I, **Irena M. Goldstein**, move to be admitted *pro hac vice* to the bar of this Court for the purpose of representing Javelin Global Commodities (UK) Ltd in the instant matter. In support of this motion, I submit the following information as required by Rule 12.01(F):

a. Full name of the movant-attorney;
Irena M. Goldstein

b. Address and telephone number of the movant-attorney;
Paul Hastings LLP
200 Park Avenue
New York, NY 10166
Telephone: (212) 318-6093
Facsimile: (212) 303-7093
Email: irenagoldstein@paulhastings.com

¹ The Debtors in these cases are each incorporated or organized in the state of Delaware, and along with the last four digits of each Debtor's federal tax identification number (or SEC filing number if unavailable), are: Foresight Energy LP (8894); Foresight Energy GP LLC (8332); Foresight Energy LLC (7685); Foresight Energy Employee Services Corporation (7023); Foresight Energy Services LLC (6204); Foresight Receivables LLC (2250); Sugar Camp Energy, LLC (8049); Macoupin Energy LLC (9005); Williamson Energy, LLC (9143); Foresight Coal Sales LLC (8620); Tanner Energy LLC (0409); Sitran LLC (9962); Seneca Rebuild LLC (0958); Oeneus LLC (6007); Adena Resources, LLC (4649); Hillsboro Transport LLC (6881); American Century Transport LLC (SEC No. 5786); Akin Energy LLC (1648); American Century Mineral LLC (SEC No. 5788); Foresight Energy Finance Corporation (5321); Foresight Energy Labor LLC (4176); Viking Mining LLC (4981); M-Class Mining, LLC (5272); MaRyan Mining LLC (7085); Mach Mining, LLC (4826); Logan Mining LLC (2361); LD Labor Company LLC (8454); Coal Field Repair Services LLC (9179); Coal Field Construction Company LLC (5694); Hillsboro Energy LLC (1639); and Patton Mining LLC (7251). The address of the Debtors' corporate headquarters is One Metropolitan Square, 211 North Broadway, Suite 2600, St. Louis, Missouri 63102.

- c. *Name of the firm or letterhead under which the movant practices;*
Paul Hastings LLP
- d. *Name of the law school(s) movant attended and the date(s) of graduation therefrom;*
Rutgers School of Law - 1988
- e. *State and federal bars of which the movant is a member, with dates of admission and registration numbers, if any;*
State of New Jersey: 1988
State of New York: 1991
United States District Court for New Jersey: 1988
United States District Court for the Eastern District of New York: 1991
United States District Court for the Southern District of New York: 1991
- f. *Statement that movant is a member in good standing of all bars of which movant is a member and that movant is not under suspension or disbarment from any bar;*
Movant is a member in good standing of all bars of which Movant is a member and he is not under suspension or disbarment from any bar.
- g. *Statement that movant does not reside in the Eastern District of Missouri, is not regularly employed in this District, and is not regularly engaged in the practice of law in this District.*

Movant does not reside in the Eastern District of Missouri, is not regularly employed in this District and is not regularly engaged in the practice of law in this District. Movant has associated with:

Thomas H. Riske
Carmody MacDonald P.C.
120 South Central Avenue, Suite 1800
Clayton, MO 63105
314-854-8600
Fax: 314-854-8660
Email: thr@carmodymacdonald.com

Movant attests under penalty of perjury to the truth and accuracy of the foregoing facts, and respectfully requests that this motion be granted and that movant be admitted *pro hac vice* to the bar of this Court and be allowed to appear in the instant matter.

Dated: March 10, 2020

{20039/00000/2796829.DOC.}

CARMODY MACDONALD P.C.

By: /s/ Thomas H. Riske

CHRISTOPHER J. LAWHORN, #45713MO
THOMAS H. RISKE, #61838MO
120 S. Central Avenue, Suite 1800
St. Louis, Missouri 63105
(314) 854-8600
(314) 854-8660 – FAX
cjl@carmodymacdonald.com
thr@carmodymacdonald.com

-and-

PAUL HASTINGS LLP

By: /s/ Irena M. Goldstein

IRENA M. GOLDSTEIN
200 Park Avenue
New York, NY 10166
Telephone: (212) 318-6093
Facsimile: (212) 303-7093
Email: irenagoldstein@paulhastings.com

Attorneys for Javelin Global Commodities (UK) Ltd

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 10, 2020, a true and correct copy of the above and foregoing pleading was filed with the Clerk of the Court using the CM/ECF system and the Notice of Electronic Filing indicates that all necessary parties were served with the document via the Court's CM/ECF.

/s/ Thomas H. Riske

In re:
Foresight Energy LP
DebtorCase No. 20-41308-kss
Chapter 11

CERTIFICATE OF NOTICE

District/off: 0865-4

User: admin
Form ID: pdfolPage 1 of 2
Total Noticed: 2

Date Rcvd: Mar 11, 2020

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Mar 13, 2020.

db +Foresight Energy LP, Metropolitan Square Building, 211 North Broadway, Suite 2600, St. Louis, MO 63102-2742
aty +Irena M. Goldstein, Paul Hastings LLP, 200 Park Avenue, New York, NY 10166-0019Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
NONE.

TOTAL: 0

***** BYPASSED RECIPIENTS *****

NONE.

TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Mar 13, 2020

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on March 11, 2020 at the address(es) listed below:

Alice Belisle Eaton on behalf of Debtor Foresight Energy LP aeaton@paulweiss.com
 Brad M. Kahn on behalf of Creditor Ad Hoc First Lien Group bkahn@akingump.com
 Brian C. Walsh on behalf of Creditor Davidson Kempner Capital Management LP
 brian.walsh@bclplaw.com
 Christopher J. Lawhorn on behalf of Creditor Javelin Global Commodities (UK) Ltd
 cjl@carmodymacdonald.com, txs@carmodymacdonald.com;aep@carmodymacdonald.com
 Ira S Dizengoff on behalf of Creditor Ad Hoc First Lien Group idizengoff@akingump.com
 Jaimie L Mansfield on behalf of Debtor Tanner Energy LLC jmansfield@atllp.com,
 bvogt@armstrongteasdale.com
 Jaimie L Mansfield on behalf of Debtor Sugar Camp Energy, LLC jmansfield@atllp.com,
 bvogt@armstrongteasdale.com
 Jaimie L Mansfield on behalf of Debtor Macoupin Energy LLC jmansfield@atllp.com,
 bvogt@armstrongteasdale.com
 Jaimie L Mansfield on behalf of Debtor Williamson Energy, LLC jmansfield@atllp.com,
 bvogt@armstrongteasdale.com
 Jaimie L Mansfield on behalf of Debtor Foresight Coal Sales LLC jmansfield@atllp.com,
 bvogt@armstrongteasdale.com
 John G. Willard on behalf of Debtor Oeneus LLC jwillard@armstrongteasdale.com,
 bvogt@armstrongteasdale.com
 John G. Willard on behalf of Debtor Mach Mining, LLC jwillard@armstrongteasdale.com,
 bvogt@armstrongteasdale.com
 John G. Willard on behalf of Debtor Foresight Energy Labor LLC jwillard@armstrongteasdale.com,
 bvogt@armstrongteasdale.com
 John G. Willard on behalf of Debtor Foresight Energy Finance Corporation
 jwillard@armstrongteasdale.com, bvogt@armstrongteasdale.com
 John G. Willard on behalf of Debtor Sitran, LLC jwillard@armstrongteasdale.com,
 bvogt@armstrongteasdale.com
 John G. Willard on behalf of Debtor MaRyan Mining LLC jwillard@armstrongteasdale.com,
 bvogt@armstrongteasdale.com
 John G. Willard on behalf of Debtor Akin Energy LLC jwillard@armstrongteasdale.com,
 bvogt@armstrongteasdale.com
 John G. Willard on behalf of Debtor Adena Resources, LLC jwillard@armstrongteasdale.com,
 bvogt@armstrongteasdale.com
 John G. Willard on behalf of Debtor Seneca Rebuild LLC jwillard@armstrongteasdale.com,
 bvogt@armstrongteasdale.com
 John G. Willard on behalf of Debtor Hillsboro Transport LLC jwillard@armstrongteasdale.com,
 bvogt@armstrongteasdale.com
 John G. Willard on behalf of Debtor American Century Transport LLC
 jwillard@armstrongteasdale.com, bvogt@armstrongteasdale.com

District/off: 0865-4

User: admin
Form ID: pdfol

Page 2 of 2
Total Noticed: 2

Date Rcvd: Mar 11, 2020

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system (continued)

John G. Willard on behalf of Debtor American Century Mineral LLC
jwillard@armstrongteasdale.com, bvoigt@armstrongteasdale.com
Kathryn Redmond on behalf of Debtor LD Labor Company LLC kredmond@atllp.com, bvoigt@atllp.com
Kathryn Redmond on behalf of Debtor Coal Field Repair Services LLC kredmond@atllp.com,
bvoigt@atllp.com
Kathryn Redmond on behalf of Debtor Coal Field Construction Company LLC kredmond@atllp.com,
bvoigt@atllp.com
Kathryn Redmond on behalf of Debtor Logan Mining LLC kredmond@atllp.com, bvoigt@atllp.com
Mark V. Bossi on behalf of Creditor Ad Hoc First Lien Group mbossi@thompsoncoburn.com,
lmckinnon@thompsoncoburn.com
Marshall C. Turner on behalf of Creditor Huntington National Bank
marshall.turner@huschblackwell.com,
gail.sinnett@huschblackwell.com;marshall-turner-8668@ecf.pacerpro.com
Office of US Trustee USTPRRegion13.SL.ECF@USDOJ.gov
Richard W. Engel, Jr. on behalf of Debtor Patton Mining LLC rengel@armstrongteasdale.com,
bvoigt@armstrongteasdale.com;srice@armstrongteasdale.com;tritter@armstrongteasdale.com;jrenaud@arm
strongteasdale.com
Richard W. Engel, Jr. on behalf of Debtor Foresight Energy GP LLC
rengel@armstrongteasdale.com,
bvoigt@armstrongteasdale.com;srice@armstrongteasdale.com;tritter@armstrongteasdale.com;jrenaud@arm
strongteasdale.com
Richard W. Engel, Jr. on behalf of Debtor Foresight Energy LLC rengel@armstrongteasdale.com,
bvoigt@armstrongteasdale.com;srice@armstrongteasdale.com;tritter@armstrongteasdale.com;jrenaud@arm
strongteasdale.com
Richard W. Engel, Jr. on behalf of Debtor Foresight Energy Services LLC
rengel@armstrongteasdale.com,
bvoigt@armstrongteasdale.com;srice@armstrongteasdale.com;tritter@armstrongteasdale.com;jrenaud@arm
strongteasdale.com
Richard W. Engel, Jr. on behalf of Debtor Foresight Energy Employee Services Corporation
rengel@armstrongteasdale.com,
bvoigt@armstrongteasdale.com;srice@armstrongteasdale.com;tritter@armstrongteasdale.com;jrenaud@arm
strongteasdale.com
Richard W. Engel, Jr. on behalf of Debtor Foresight Energy LP rengel@armstrongteasdale.com,
bvoigt@armstrongteasdale.com;srice@armstrongteasdale.com;tritter@armstrongteasdale.com;jrenaud@arm
strongteasdale.com
Richard W. Engel, Jr. on behalf of Debtor Foresight Receivables LLC
rengel@armstrongteasdale.com,
bvoigt@armstrongteasdale.com;srice@armstrongteasdale.com;tritter@armstrongteasdale.com;jrenaud@arm
strongteasdale.com
Richard W. Engel, Jr. on behalf of Debtor M-Class Mining, LLC rengel@armstrongteasdale.com,
bvoigt@armstrongteasdale.com;srice@armstrongteasdale.com;tritter@armstrongteasdale.com;jrenaud@arm
strongteasdale.com
Richard W. Engel, Jr. on behalf of Debtor Viking Mining LLC rengel@armstrongteasdale.com,
bvoigt@armstrongteasdale.com;srice@armstrongteasdale.com;tritter@armstrongteasdale.com;jrenaud@arm
strongteasdale.com
Richard W. Engel, Jr. on behalf of Debtor Hillsboro Energy LLC rengel@armstrongteasdale.com,
bvoigt@armstrongteasdale.com;srice@armstrongteasdale.com;tritter@armstrongteasdale.com;jrenaud@arm
strongteasdale.com
Thomas H Riske on behalf of Creditor Javelin Global Commodities (UK) Ltd
thr@carmodymacdonald.com, syd@carmodymacdonald.com;ala@carmodymacdonald.com
Timothy P. Palmer on behalf of Creditor Huntington National Bank timothv.palmer@bipc.com
Zachary Dain Lanier on behalf of Creditor Ad Hoc First Lien Group zlanier@akingump.com

TOTAL: 42